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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Marlene H. Dortch
Secretary
Federal Communications Commission
445-12th Street, S.W.
Washington, D.C. 20554

Re: Ex Parte

WC Docket No. 02-148
Qwest Communications International, Inc.
Consolidated Applications for Authority to Provide In-Region, InterLATA Services in Colorado, Idaho, Iowa, Nebraska and North Dakota

WC Docket No. 02-189
Qwest Communications International, Inc.
Consolidated Applications for Authority to Provide In-Region, InterLATA Services in Montana, Utah, Washington and Wyoming

Dear Ms. Dortch:

Attached for inclusion in the record in the above-referenced proceedings are Qwest Communications International Inc.'s ("Qwest's") responses to questions raised by FCC staff in connection with local use to dark fiber EELs; a reject notice PID; prequalification of new CLEC voice customers; and CLEC-specific reject rates pertaining to pre-order address validation and CSR. These responses were provided to FCC staff yesterday and today. Also attached is Qwest's response to a question raised by the Department of Justice ("DOJ") pertaining to pre-order/order integration. This response was provided to the DOJ today.

Pursuant to the Public Notices in these proceedings, Qwest is submitting an original and two redacted copies of this filing. Qwest separately is

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submitting an original and one copy of the confidential portions of this filing. Six copies each of the redacted and confidential versions of this filing also are being submitted to Janice Myles of the Wireline Competition Bureau.

Qwest submits the enclosed documents with the understanding that they will be subject to the Protective Order in this proceeding. Inquiries regarding access to the confidential portions of these documents (subject to the terms of the Protective Order) should be addressed to the following:

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The twenty-page limit does not apply to this filing. Please contact the undersigned if you have any questions.

Sincerely,

Yaron Dori

Enclosures

cc: M. Carowitz
E. Yockus
J. Myles
K. Brown
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P. Fahn
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S. Oxley

Question

Please describe Qwest's policies regarding the application of the local use restriction to dark fiber EELs.

Response

Qwest applies the Commission's local use restriction solely to EELs, i.e., combinations that Qwest makes, on behalf of the CLEC, of loop and transport network elements.[1] Qwest does not apply the Commission's local use restriction for EELs to dark fiber in all cases, as AT&T implied in its comments on Qwest's ROC I Application, but only when the dark fiber in question is provided as part of a loop-transport combination, i.e., an EEL.[2] Upon request, Qwest will make a combination of a dark fiber loop and a dark fiber transport network element for a CLEC in the serving wire center of the loop via any technically feasible method of combination, such as a cross connect via a Fiber Distribution Panel (FDP).[3] Qwest can combine a dark fiber loop and a transport UNE without lighting the dark fiber (i.e., without installing the electronics necessary to provide telecommunications services). The CLEC would be required to place suitable electronics

[1] The Initial Checklist Item 2 Declaration of Lori A. Simpson and Karen A. Stewart (ROC I) at pages 48-58 discusses EELs and the application of the local use restriction.

[2] ROC I Reply Declaration of Karen A. Stewart at 13, ¶ 27.

[3] The Initial Checklist Item 2 Declaration of Lori A. Simpson and Karen Stewart (ROC I) states at page 17 that a CLEC may ask for any combination of network elements. A dark fiber EEL would be considered a UNE combination that Qwest currently combines in its network, but for which there is no standard product developed. To order a dark fiber EEL, the CLEC therefore would submit a Special Request Process (SRP) form. The Initial Checklist Item 2, 4, and 5 Dark Fiber Declaration of Karen A. Stewart, beginning at page 4, paragraph 5, confirms that Qwest provides access to dark fiber both in the loop and interoffice transport network.

at the end-user end of the loop and at the distant end of the transport UNE to light the dark fiber EEL.

If a CLEC were to order dark fiber loop and dark fiber transport separately and combine the two network elements itself, rather than ordering an already-combined dark fiber EEL from Qwest, then the local use restriction would not apply.

Qwest has received several Initial Records Inquires (IRIs) for dark fiber EELs from CLECs using the Special Request Process. As of August 1, 2002, Qwest had provisioned one dark fiber loop and dark fiber transport combination in the state of Minnesota, and none in any other state in its region.

Question

Why is Qwest not implementing a PID for confirmation of reject notices in response to KPMG's white paper on service order accuracy?

Response

Qwest did not begin developing a new measurement addressing accuracy of rejection notifications, because the OSS test yielded no evidence of problems with the accuracy of rejection notifications. Accordingly, in response to KPMG's study, Qwest provided data confirming that accuracy levels are very high for rejection notifications and agreed to continue to provide this data through the Long-Term PID Administration (LTPA) process, where the parties can examine it and discuss whether an additional measurement is needed. In addition, given that Qwest already reports well over 700 sub-measurements per CLEC, per state, per month, the emphasis should be to reduce, rather than increase, the number of measurements. Measurements for which Qwest demonstrates consistently high performance will be candidates for removal. Hence, it would be premature to begin developing a new measurement, particularly where the test indicated no problems and where that is confirmed by current data.

The context in which KPMG issued its white paper (titled, "Qwest Manual Order Entry Performance Indicator Description Adequacy Study," [1]) was such that there was no expectation for Qwest to immediately take steps to implement all suggestions. Instead, the study was seen as one of many inputs to the ongoing process of monitoring Qwest's performance and discussing what should be measured and how. In its white paper, KPMG went to some length to emphasize that its suggestions were intended to be

inputs into the Long-Term PID Administration Process, and that they did not carry the same weight as its findings in the OSS test. Specifically, KPMG stated:

> KPMG Consulting is on record as stating that, in our professional opinion, definition of performance measures is best conducted in a public forum using due process. However, we have agreed to express our professional opinion on the adequacy of performance measures in this area in order to satisfy the express wishes of the Steering Committee. The opinions expressed herein do not constitute statements of fact, and do not carry the weight of findings such as those contained in our Final Report on the ROC OSS test. [2]

Accordingly, Qwest's reply to the KPMG study addressed all of its suggestions through a combination of steps, one of which involved development of measurements and others which called for further discussion and examination of data. Specifically, these steps were:

- Developing and proposing new performance measurements that focus on order accuracy, for further discussion and approval in one of the first long-term PID administration meetings, using as a guide similar measurements from other RBOCs;
- Gathering and reporting additional data, such as offered in response to Observation 3086, to help confirm the efficacy of Qwest's steps taken to resolve the observation; and
- Using a fact-based approach to further address manual order entry concerns, in long-term PID administration meetings, as part of an overall review of PIDs with the primary goal of more efficiently and effectively measuring and reporting Qwest's performance. Qwest envisions that this process, while generally streamlining PIDs and making them more efficient, can also result in additional PIDs that are carefully focused on validated areas of concern. [3]

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[1] The PID Adequacy Study was originally dated April 30, 2002, and then was later updated on June 11, 2002 to revise some wording about where transaction re-testing was not done.

[2] *KPMG's PID Adequacy Study*, June 11, 2002, at 1-2.

[3] *Qwest's Response to KPMG's Manual Order Entry PID Adequacy Study of April 30, 2002*, May 24, 2002, at 2.

As the OSS test indicated no problem with the accuracy of rejection notifications, and additional data provided by Qwest substantiated that accuracy is high, this matter was addressed by the additional data Qwest provided, rather than by development of a new measurement. In its response to the KPMG study, Qwest addressed the specific suggestion about measuring accuracy of rejection notifications as follows:

> Qwest believes this proposal is similar to a voluntary report that Qwest included in its response to Observation 3086. In that response, Qwest proposed providing data as to the number of LSRs that received an initial Rejection Notice and a subsequent FOC. As previously stated, Qwest is willing to provide this data, but believes it should be done as part of ongoing performance monitoring and auditing that is already called for in PAPs, in order to verify there are no problems in this area that are significant enough for investigation. Of course, this can also be a matter of discussion in long-term PID administration.
>
> PIDs measure Qwest's performance in a manner consistent with its process for delivering service, and they have never been intended for measuring out-of-process situations (i.e., circumstances that are not expected to happen at all, because they are out of process). Instead, out-of-process situations are the subject of data reconciliations and audits, and properly so. Again, in the context of PAPs that will be in effect – all of which contain provisions for data reconciliation, performance monitoring, and PID audits, with penalties for incorrect reporting – regular reporting of such exceptions as PID results is redundant and unnecessary. [4]

[4] *Id.* at 9.

Question

Please respond to Covad's complaint that Covad cannot pre-qualify a new Qwest voice customer who seeks data service from Covad until thirty days after that customer has begun receiving voice service from Qwest.

Response

Qwest provides CLECs with the ability to pre-qualify a new Qwest voice customer as soon as the service is turned up for the customer.

The LFACS database is the source of data for the Loop Qualification Database (LQDB), which is used for both wholesale and retail queries. LFACS refreshes the loop make-up information in the LQDB by wire center, on a rolling monthly basis. In other words, 1/20th of the wire centers are updated in each nightly refresh run, with the entire set of wire centers completing within a 30 calendar day period.

In the 8.0 IMA Release, which was deployed in August 2001, Qwest implemented a new capability, a "recent changes' check to the LQDB. Each time the LQDB receives a query for loop make-up information or qualification, it will send a query to LFACS to determine if there has been a change to LFACS for the queried telephone number or address that occurred after the regularly scheduled refresh for the applicable wire center. A change to LFACS can occur when new service has been installed or existing service has been moved or changed. If a change has occurred and there is new or changed data in LFACS, the new or changed data in LFACS is populated in

the LQDB and provided in the response. The "recent changes" check will assure newly installed service will be immediately added to the LQDB.

This capability was discussed briefly in paragraph 114 of the Initial Declaration of Lynn M. V. Notarianni & Christie L. Doherty (ROC I), where Qwest stated that "Qwest's Raw Loop Data offers the following features: . . . loop make-up for new service, prior to the service posting to the billing system" and further explained in footnote 138 that "[t]he loop qualification database, LQDB, provides for a recent changes check which assures that the most current information is provided regarding loop make-up information." In the Reply Declaration of Lynn M. V. Notarianni & Christie L. Doherty (ROC I), paragraph 58, the fourth bullet also briefly discussed this capability, noting that one of the IMA Release 8.0 enhancements was "[a] 'recent changes' check for updated loop make-up information in LFACS. If the Raw Loop Data Tool finds such a change, the updated LFACS information is returned."

During the ROC Third Party Test, KPMG observed this capability in action. In sections 2.1.2 and 2.1.3 of the Test 12.7 *Final Report*, KPMG included a paragraph entitled "System Performance/Database Updates" where they described the functionality as follows:

> "The LFACS database is Qwest's central repository for loop data. It serves as the source database for the loop data in the LQDB, which is updated with revised LFACS data on a nightly basis. The two databases are synchronized each month. As part of the loop qualification query process, the LQDB also queries a

'recent changes' field in the LFACS database. If this query indicates that the LFACS information has been updated, the new LFACS information is populated into the LQDB, and is used as the basis for the loop qualification query."

Question

Please provide an analysis of CLEC-specific reject rates pertaining to pre-order address validation and CSR for New Access, WorldCom (via Z-Tel) and AT&T for the same time period (6/25/02 – 7/24/02).

Answer

New Access

[Redacted]

WorldCom

[Redacted]

AT&T

[Redacted]

Attachment A

CLEC	New Access	AT&T	Z-Tel
*Timeframe**	*1 Month (6/25 - 7/24)*	*1 Month (6/25 - 7/24)*	*1 Month (6/25 - 7/24)*
Number of Address Validation Pre-Order Transactions	[Redacted]		
Number of CSR Pre-Order Transactions			
Number of LSRs submitted via EDI			
Number of LSRs submitted via EDI that were Rejected **			
% of Total Number of Submitted LSRs that were Rejected ***			
Number of Reject Messages **			
Number of Address Validation Reject Messages			
% of Total Reject messages that were Address Validation Rejects			
Number of CSR Validation Reject messages			
% of Total Reject Messages that were CSR Validation Rejects			
Number of Reject Messages that are not Related to Pre-order Transactions			
% of Total Reject Messages that were not Related to Pre-Order Transactions			

* Each timeframe is for the most recent period of the specified amount of time.

** Each LSR may have multiple reject messages.

***Percentage of rejected LSRs does not include the same exclusions or disaggregations as used in PO-4B.

Qwest Response to AT&T Comments Raised in ROC II Proceeding

AT&T raises two new claims regarding Qwest's offering of pre-order to order integration capabilities that it has not made previously in the context of a Qwest Section 271 proceeding before the FCC or any state. AT&T claims that New Access's testimonial that it has achieved successful integration does not provide any support to Qwest's demonstration of its offering of pre-order to order integration capabilities. [1] AT&T also contends that Qwest does not return parsed CSR response information in a manner that is conducive for CLECs to integrate that parsed CSR information onto LSRs. [2] Nevertheless, for the reasons set forth below, AT&T's claims do not change the fact that Qwest's offering of pre-order to order integration capabilities is Section 271 compliant.

A. New Access' Affirmation of Achievement of Successful Integration is Valid Evidence of Successful Commercial Integration

AT&T claims that New Access' testimonial is meaningless because it does not describe who developed its integration capability, when it began to auto-populate LSRs, and the extent to which it pre-populates LSRs. [3] Additionally, AT&T contends that New Access' assertion that it uses

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[1] *See* AT&T Comments at 40 and Finnegan/Connolly/Menezes Decl. at ¶ 133.

[2] *See* AT&T Comments at 40 and Finnegan/Connolly/Menezes Decl. at ¶¶ 136-138.

[3] *See* AT&T Comments, Finnegan/Connolly/Menezes Decl. at ¶ 133.

EDI pre-ordering data to populate EDI order translations is inconsistent with previous evidence provided by Qwest regarding CLECs' use of its test environment. [4]

New Access has responded to each of these questions posed by AT&T. [5] Specifically, New Access confirmed that software programmer Dave Lueck developed its pre-order to order integration capability. [6] Also, New Access affirmed that it began to auto-populate LSRs in production as of June 1, 2002, using all relevant fields from the Address Validation Response and CSR Response transactions to pre-populate the order, and that remaining fields are populated based on end-user preferences. [7] Finally, Qwest already has shown that there is no merit to AT&T's claim that New Access' assertion that it uses EDI pre-ordering data to populate EDI order translations is inconsistent with Qwest's recent ex parte regarding the CLECs' use of its test environment. [8]

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4 *See id.*

5 *See* Qwest August 8 Ex Parte on New Access Integration of Pre-order/Order Activities)

6 *See id.*

7 *See id.*

8 *See id.* AT&T bases its claim on a confidential ex parte attachment filed by Qwest on July 15. *See* Qwest July 15 Ex Parte on Number of CLECs Using SATE. That ex parte includes a chart listing, as of June 1, 2002, the CLECs that had been certified using one of Qwest's testing environments. In a July 19 ex parte filing, Qwest updated the chart to reflect CLEC activity as of July 9, 2002. *See* Qwest July 19 Ex Parte on Wholesale Service Performance, Wholesale Service Delivery, SATE and Billing. The New

AT&T also contends that New Access uses Qwest's EDI interface to only submit suspend, restore, and disconnect orders, implying that this is the only functionality that New Access was able to implement. [9] Additionally, AT&T attempts to minimize New Access' achievements by stating that it only uses the address validation function and the retrieval of a CSR. [10] New Access, like most CLECs, plans its IMA-EDI implementations by prioritizing the products and activities that its business uses most often or that have the highest transaction volumes. New Access determined that the automation of the suspend/restore function would have the greatest immediate impact on its business. Additionally, New Access's plan was to build incrementally and ensure that the planned benefits were achievable (as demonstrated by its extremely low error rate). New Access's next step was to incorporate the transactions of two additional companies (all are owned by the same entity), into its IMA-EDI process. Transactions that are submitted in lower volumes, such as Change Orders and Conversion orders, are planned for a later IMA-EDI implementation date and will follow the same business procedure of methodical implementation prior to further expansion.

Access letter is consistent with the information provided to the FCC in the confidential ex parte attachments.

9 *See* AT&T Comments, Finnegan/Connolly/Menezes Decl. at ¶ 133, n.87.

10 *See id.*

AT&T asserts that New Access was "advised by Qwest to integrate only the address validation function in order to populate address information into the LSR, because that function would be a more reliable source of address information." [11] This is not true. In fact, Qwest *highly recommends* all CLECs implement Address Validation and CSR, at a minimum. [12] There are two reasons for Qwest's recommendation. First, it helps the CLEC achieve better reject rates and high flow-through rates for orders. Second, Address Validation and CSR are the most critical pre-order transactions, because all product orders must have a valid address and customer service data. The CLEC generally will achieve greater benefit as a result of its development efforts for these transactions. Prior to each product order, the CLEC should submit an Address Validation and CSR Query. Other pre-order functions are used more on an as-needed basis. For example, a TN Reservation may have to be performed prior to placing an order for new service, but not for the other order types.

AT&T also contends that New Access only submits low volumes of orders to Qwest and that New Access required "one and one-half years to

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[11] *See id.*

[12] Through its documentation, Qwest recommends to all CLECs that they perform address validations as part of their pre-order processes. *See* Qwest August 13 Ex Parte on Validation of Customer Addresses and Status of Change Requests; *see also* Qwest August 8 Ex Parte on Address Validation.

develop the limited integration capability that it has managed to achieve." [13] Based on the volume of LSRs as shown in the commercial performance for PID PO-4, the volume of LSRs submitted by New Access is not low. Additionally, in comparison to other CLECs in the first month of EDI implementation, New Access order volumes are very high. [14]

AT&T also is very misleading in asserting that New Access's implementation of integrated pre-order and order activities took one and one-half years to complete. Over the course of this time, New Access was delayed by server/hardware changes, business reprioritization, and the shift of the sole developer's time to other areas of responsibility. New Access successfully implemented IMA-EDI pre-order to order integration with *one* person, who performed multiple roles involving hardware configuration, requirements analysis, system design and development, testing and now production support.

AT&T minimizes the successful implementation of pre-order/order integration by HP, Telcordia, and Nightfire as a means to show that other CLECs can also integrate successfully, only because these companies have "extensive expertise in highly technical computer project." [15]

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[13] *See* AT&T Comments, Finnegan/Connolly/Menezes Decl. at ¶ 133, n.87.

[14] *See* Confidential Attachment 1 (CLEC EDI Order Volumes for Initial Months of Implementation).

[15] *See* AT&T Comments, Finnegan/Connolly/Menezes Decl at ¶132.

AT&T contends that CLECs that presumably do not share the same level of expertise "would be required to employ a variety of outside systems analysts, programmers and developers [employed by sophisticated companies such as HP] in order to have any prospect of achieving integration successfully." [16] This effort is not nearly as complex as AT&T implies. Nevertheless, as noted above, New Access' successful achievement of integration based on the efforts of *one* person belies this AT&T claim.

B. Qwest Provides CLECs with Parsed CSR Information in a Manner that Allows CLECs to Successfully and Efficiently Auto-Populate Information onto an LSR

AT&T nit picks HP's report in an attempt to show that integrating pre-order/order data using Qwest's systems is extremely difficult and concludes that the effort outweighs the benefits. [17] Qwest believes that, like most OSS telecommunications endeavors, constructing a functioning, certifiable EDI interface requires experience and skill, as does all OSS software development. Nevertheless, HP found that a CLEC with such attributes "can build a CSR to LSR parsing interface." [18] Additionally, for both LSOG 3 and LSOG 5, HP found that "CLECs can utilize Qwest's EDI PreOrder transactions to automatically populate an order without data

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16 *See id.* at ¶135.

17 *See* AT&T Comments at 40 and Finnegan/Connolly/Menezes Decl. at ¶¶ 134-137.

18 *See* HP July 31 Ex Parte Regarding HP Pre-order to Order Integration Report v.6.0.

manipulation." [19] This is a clear endorsement of Qwest's pre-order/order integration capabilities.

HP's findings show that Qwest allows CLECs to accomplish successful pre-order to order integration by providing CLECs with ample parsed data. [20] Qwest also has submitted evidence of the parsing documentation that it offers to CLECs. [21] AT&T claims that it has experienced difficulties in using parsed data provided by Qwest to populate data electronically onto an LSR. [22] AT&T claims "the information in the service and equipment section of the CSR cannot efficiently and successfully be auto-populated into a local service request." [23] In fact, Qwest provides all of the information required by the CLEC to successfully and efficiently auto-populate CSR data in an LSR in the EDI Disclosure Documents. [24]

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19 *See* OSS Decl., Exhibit LN-OSS-12 (HP Pre-Order to Order Integration Report, Version 5.0, April 15, 2002) at 10.

20 *See id.*

21 *See* Qwest July 25 Ex Parte on Pre-order to Order Integration); *see also* OSS Decl., Exhibit LN-OSS-5 (Appendix A – Developer Worksheets – Pre-order).

22 *See* AT&T Comments at 40 and Finnegan/Connolly/Menezes Decl. at ¶¶ 136-138.

23 *See* AT&T Comments, p. 40, Finnegan/Connolly/Menezes Decl at ¶138, note 83.

24 The Qwest website contains links to the relevant IMA-EDI documents for all three currently available IMA releases: http://www.qwest.com/disclosures/netdisclosure409.html *See* OSS Decl., Exhibit LN-OSS-5 (Appendix A – Developer Worksheets – Pre-Order) at 40.

HP used the publicly available documentation described above to develop and implement integrated pre-order to order CSR capabilities for IMA. [25] HP describes and illustrates the development effort to accomplish the CSR pre-order/order integration in a straightforward manner. [26] This is not the complex undertaking that AT&T asserts with its claim that "[t]he prospects of such success are dubious at best." [27]

HP utilized the fielded data returned on a Customer Service Response Query (CSRQ) to populate a temporary table containing fields, such as, Telephone Number (TN), PIC, LPIC, and USOCs. This temporary table was then used to successfully build the Resale POTS and UNE-P POTS order. [28]

HP's initial development was accomplished in a matter of months with few resources and upgrades on subsequent IMA-EDI releases were completed in several weeks to a month. [29] Furthermore, HP accomplished integration utilizing "common information technologies for the

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[25] *See* Attachment 2 (HP August 15 Response to Request for Information Regarding Pre-Order to Order Integration) at1.

[26] *See id* at 2-3.

[27] *See* AT&T Comments at 40 and Finnegan/Connolly/Menezes Decl. at ¶ 135.

[28] Additional detail describing how HP accomplished successful pre-order to order integration is included in Attachment 2 (HP August 15 Response to Request for Information Regarding Pre-Order to Order Integration).at 2.

[29] *See id.* at 1.

reading, storing, sorting and presentation of data. HP's development and implementation of pre-order/order integration capabilities was completed using commercially available or industry standards-based software, programming languages and operating systems." [30] HP's experience demonstrates that integration is achievable using Qwest's extensive documentation and common software technology. Furthermore, contrary to AT&T's assertion, HP demonstrates that the benefit is worth the effort. [31]

Additionally, Qwest's Recap functionality provided in the IMA-GUI demonstrates a very similar undertaking to that described by HP. In providing the Recap capability, the IMA-GUI presents to the CLEC the CSR data using the TN orientation. Qwest's IMA-GUI development team relies on the same CSR data from the Qwest BOSS/CARS legacy systems. The IMA-GUI development team must undertake similar steps as a CLEC to achieve CSR pre-order to order integration. Qwest successful implementation of this Recap functionality demonstrates that CSR pre-order to order integration is not only possible, but can be achieved based on a CSR with a USOC orientation. [32]

AT&T's experience of successful submission of thousands of LSRs over many years confirm that AT&T's eleventh hour complaints are

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30 *See id.* at 4.

31 *See* Qwest's July 29 Ex Parte on Pre-Order to Order Integration.

32 *See* Attachment 3 (IMA-GUI Recap Function Example)

mere grandstanding. Qwest's parsed CSR is not an impediment to successful pre-order to order integration. On the contrary, Qwest's provision of parsed CSR information enables CLECs to successfully and efficiently auto-populate information onto an LSR.

ATTACHMENT 1

CLEC EDI Order Volumes for First Month of Implementation

CLEC	First Month Order Volume
New Access	
Time Warner	
ATG	
Focal	
KMC	
Z-Tel	
VarTec	
Cbeyond	
Adelphia	
Vanion	

ATTACHMENT 2

HP August 15 Response to Request for Information Regarding Pre-order/Order Integration

Level of Effort

HP developed and implemented the following functionality based upon publicly available Qwest IMA EDI Releases 6.0 and 7.0 documentation:

- Pre-Order response to Pre-Order query integration for address related data
- Pre-Order response to Order integration for address related data
- Pre-Order response to Order integration for Customer Service Record (CSR) related data for Resale POTS & UNE-P POTS orders

The IMA EDI Release 7.0 information is documented in HP Final Report, Appendix B, Section 5 - P-CLEC Data Integration, pages 38-39 of the HP Pre-Order/Order Integration Field Comparison Report - Analysis of Qwest IMA EDI Release 7.0. HP did not produce a final report appendix for IMA EDI Release 6.0.

HP's IMA EDI 6.0 initial development effort required approximately 3-4 Full Time Equivalents (FTEs) working over a 3-4 month time frame. Upgrading the HP technology to a new Qwest IMA EDI release was 2 or more man months of effort per release. This typically involved 2-3 Full Time Equivalents (FTEs) working over several weeks to one month. The level of effort was based upon the number and scope of changes between the previous release and the new release.

CSR Pre-Order/Order Integration

HP's Services & Equipment data pre-population capability in the HP Data Entry Form Tool was designed to allow a customer service representative to perform a Customer Service Record (CSR) pre-order query (CSRQ). When an exact match response was returned from Qwest for that account, the Services & Equipment information was stored in memory and then made available for use in pre-populating order related fields in a Resale POTS or UNE-P POTS order transaction.

The CSR response data was loaded into a temporary table for each user per log-in session. The Resale (RS) form for Resale POTS and UNE-P POTS orders included a "Retrieve CSRR Data" selection button to display a view of the most recent CSRR data. When an entry from the CSR Services & Equipment window was selected, the appropriate data fields on the form tool screen was populated from the temporary table.

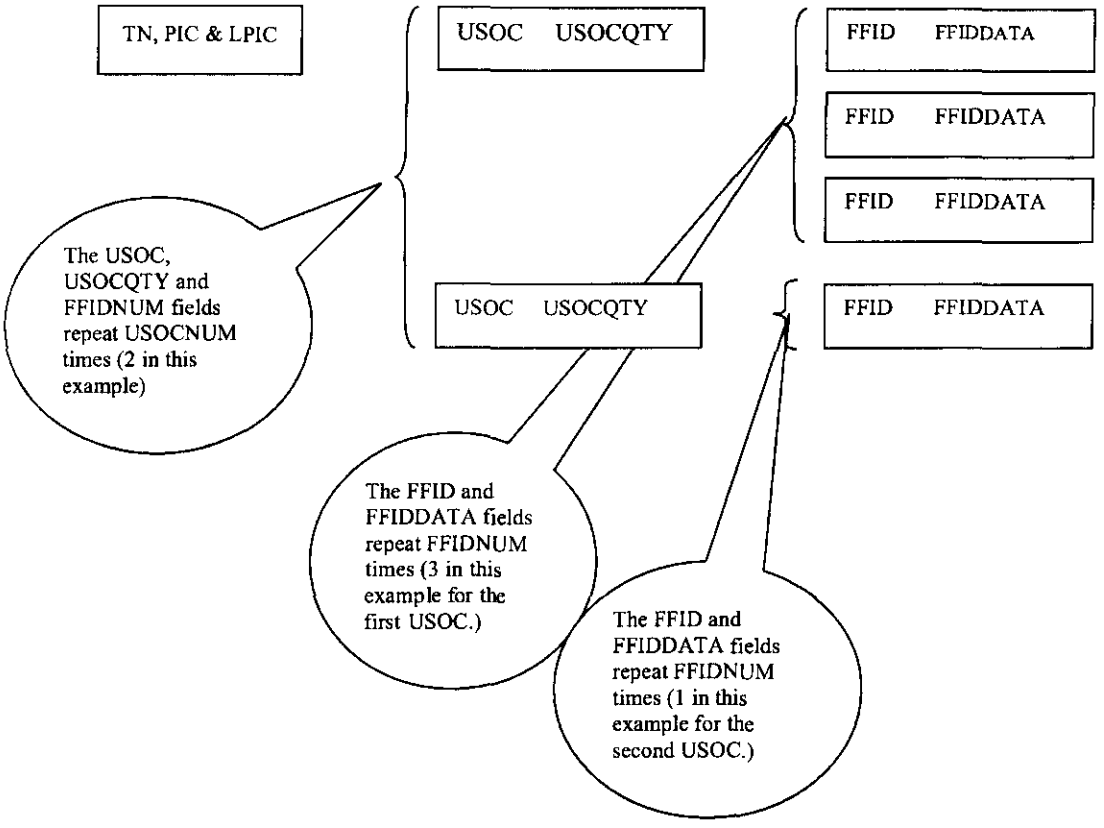
The following steps were used to perform pre-order and order activities and submit a Resale POTS or UNE-P POTS order (LSR) for an existing customer:

1. Validate Service Address using pre-order Address Validation Query (AVQ) with the Telephone Number (TN) or Service Address.
2. Obtain Customer Service Record (CSR) data using Customer Service Record Query (CSRQ) - the address information in the response from Step 1 was integrated into the pre-population of the CSR Query in Step 2.
3. Build an order for Resale POTS or UNE-P POTS integrating the address information in the response from Step 1 and the Step 2 CSR data.
4. Review the order to ensure products and services are consistent with customer requests and CLEC interconnection terms.
5. Submit the order to Qwest

HP developed the CSR integration component by first reviewing the publicly available Qwest IMA EDI Disclosure documentation and Product Catalogs on the Qwest Wholesale web-site. The temporary table that held the CSR Response data contained the following types of information:

Field Returned on Exact Match	***Description***
TN	Telephone Number
PIC	InterLATA Presubscription Indicator Code
LPIC	IntraLATA Presubscription Indicator Code
USOCNUM	Number of USOC's
USOC (occurs USOCNUM times)	USOC
USOCQTY (occurs USOCNUM times)	Quantity per USOC
FFIDNUM (occurs USOCNUM times)	Number of Floating FIDs
FFID (occurs FFIDNUM times per USOC)	Floating FID
FFIDDATA (occurs FFIDNUM times per USOC)	Floating FID Data

HP associated each entry in the table with the TN provided on the USOC. When a customer service representative selected the "Retrieve CSRR Data" option while building an order, the application sorted and presented the account data in TN - USOC - FID/FIDDATA format. The following diagram illustrates how the data was sorted for presentation to the user.



The HP Data Entry Form Tool organized and presented the CSR data in the following manner.

TN	USOC	FFID	FFIDDATA
303-555-1234	LMB	/LCC	KXR
		/VFA	
	ESM		
	RBE1X	/DES	RSTRCTD DO NOT RMV RTY OR KX9-TBE-A WO DEP OR RECLASS
303-555-1235	LMB	/LCC	KXR
		/VFA	
	ESM		

The HP Data Entry Form Tool gave the customer service representative the option to pre-populate on the order form only select Telephone Numbers (TNs) on the account or ALL TNs on

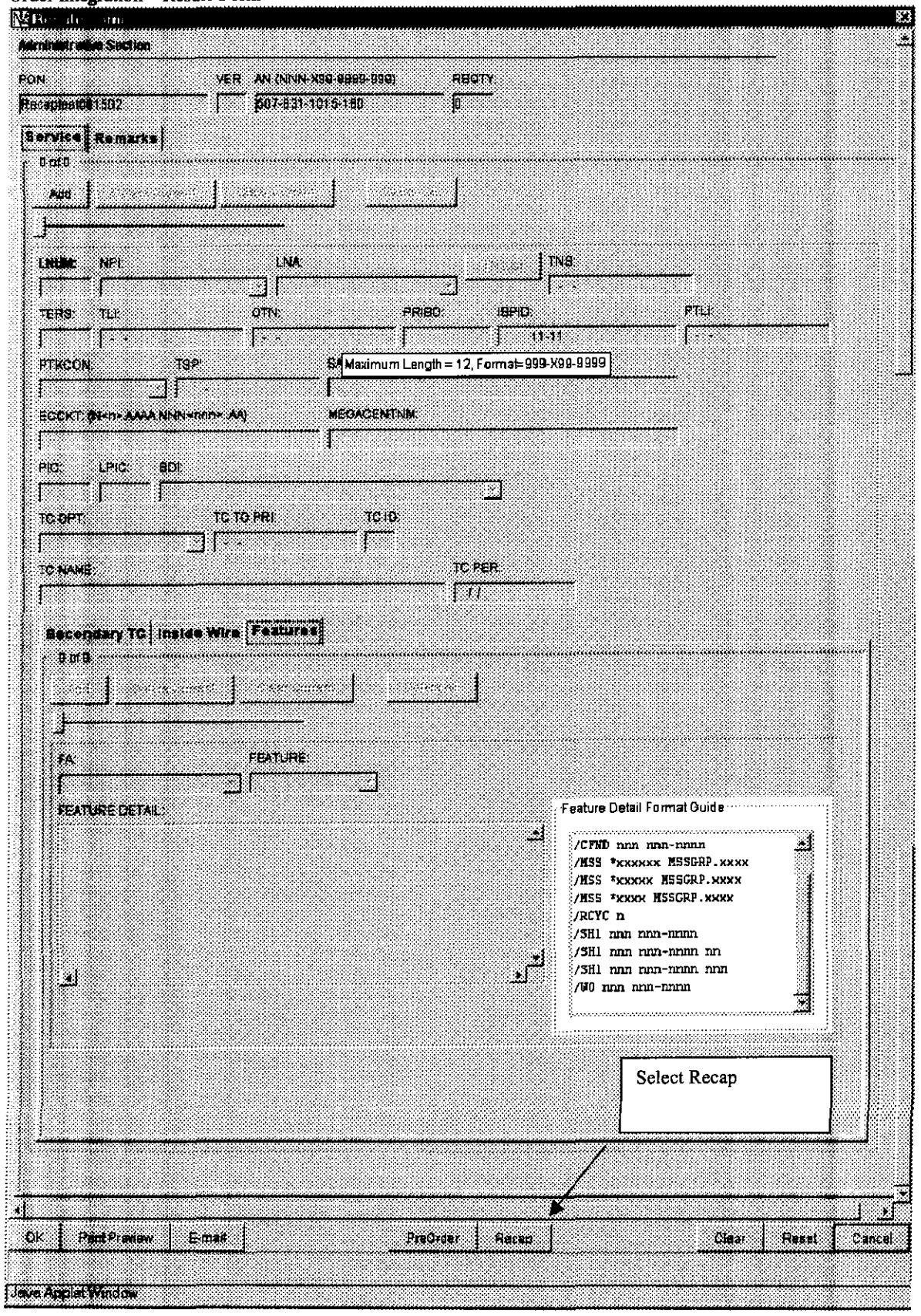
an account. The customer service representative reviewed the activity codes and USOCs on each TN to ensure that the order contained products and services consistent with customer requests and CLEC interconnection terms.

While each CLEC has their own information technology infrastructure and operating environment, the fundamental concepts and approaches to software development and integration transcend these permutations. HP utilized common information technologies for the reading, storing, sorting and presentation of data. The HP development and implementation of the pre-order/order integration capabilities was completed using commercially available or industry standards-based software, programming languages and operating systems.

ATTACHMENT 3

IMA-GUI Recap Function Example

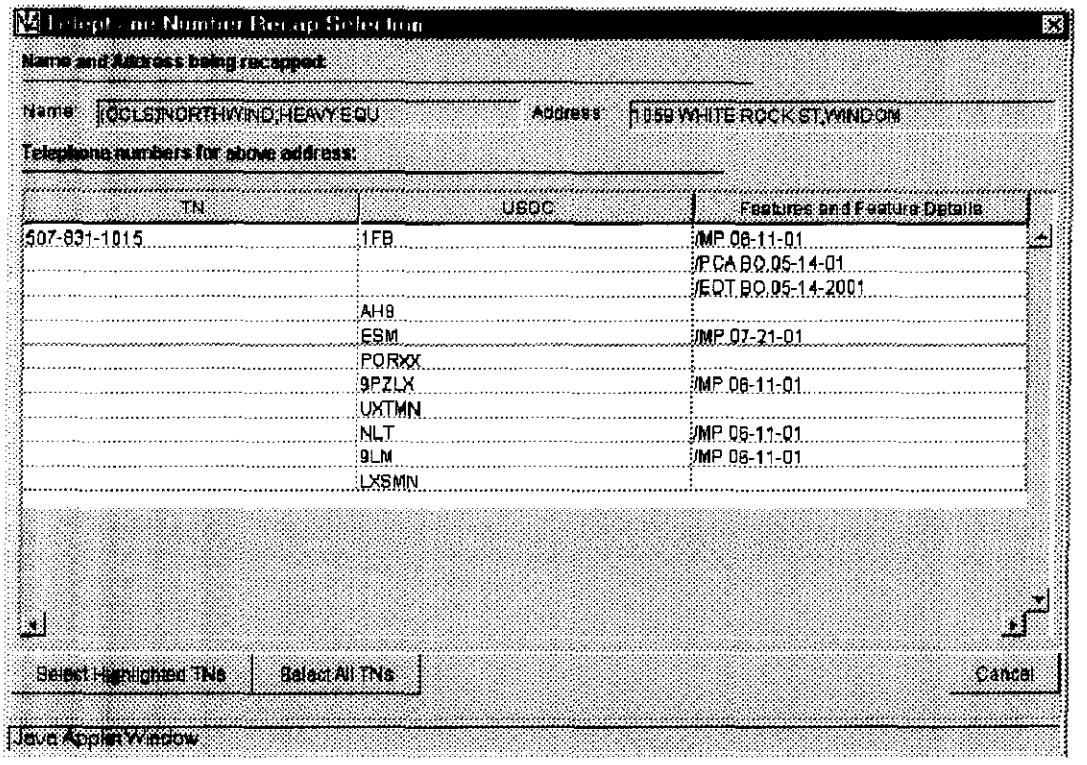
Order integration – Resale Form



ATTACHMENT 3

IMA-GUI Recap Function Example

Telephone Number Recap Selection Screen:



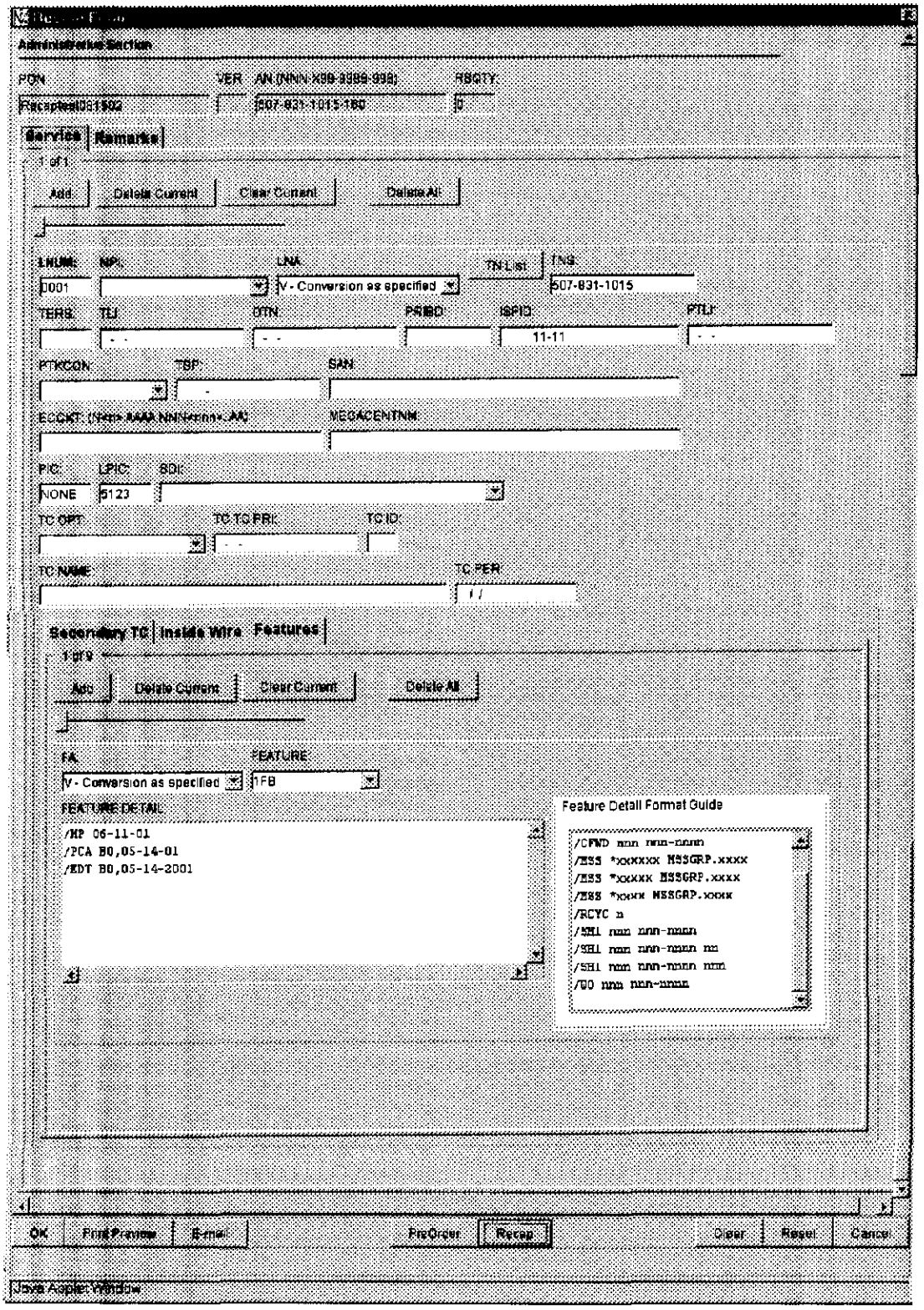
Action:
Option 1: Select Highlighted TNs

Option 2: Select All TNs

ATTACHMENT 3

IMA-GUI Recap Function Example

Populated Resale Form:



ATTACHMENT 3

IMA-GUI Recap Function Example